



California Regional Water Quality Control Board

Santa Ana Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

August 24, 2010

R. Gaylord Smith
LEWIS BRISBOIS BISGAARD & SMITH
550 West "C" Street, Suite 800
San Diego, CA 92101

NORTHROP'S REQUEST THAT A CEASE AND DESIST ORDER BE ISSUED TO THE ORANGE COUNTY WATER DISTRICT

Dear Mr. Smith:

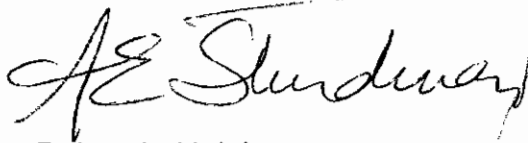
We have reviewed your letter dated August 6, 2010, in which you requested that the Santa Ana Regional Water Quality Control Board (Regional Board) issue a cease and desist order to the Orange County Water District (OCWD) for discharges of volatile organic compounds (VOCs) to the main aquifer in Orange County. You allege that the OCWD is causing these discharges via extraction wells that were installed by the OCWD in conjunction with their North Basin Groundwater Protection Project (NBGPP). You stated that three of the extraction wells, one of which is upgradient of the Northrop Y-12 facility, are screened in both the upper and main aquifers. You also stated that since seals were not installed between the screened intervals, a conduit was created by which groundwater containing VOCs in the upper aquifer is traveling to the main aquifer, where VOCs are at much lower concentrations than in the upper aquifer. You have also provided water quality data and a technical report as supporting documents for your request.

Based on the information that has been provided to us, there does not appear to be a sufficient basis for issuing a cease and desist order at this time. Certainly, the issue of higher concentrations of VOCs in the upper aquifer possibly discharging to the main aquifer is of concern to us. We will review the information you have provided and evaluate the possibility that this discharge is occurring. We have a meeting scheduled with the OCWD to discuss Northrop's recirculation well pilot test. We will also discuss the possibility that OCWD's extraction wells may be a conduit for discharges to the main aquifer with OCWD at that time. Depending on the outcome of our investigation, we may contact you to discuss this matter further, including possible actions that could be taken if a discharge is occurring.



If you have any questions, please contact Ann Sturdivant, Chief of our Site Cleanup Section, at (951) 782-4904, or via email to asturdivant@waterboards.ca.gov, or you may call me at (951) 782-3298, or send email to rholum@waterboards.ca.gov.

Sincerely,



for

Robert L. Holub
Division Chief

cc: David Rice, SWRCB, OCC (DavidRice@waterboards.ca.gov)
Roy Herndon, OCWD (rhoherndon@OCWD.com)

